

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of:

Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio) PR Docket No. 92-235
Services and Modify the Policies)
Governing Them)

To: The Commission

REPLY COMMENTS OF

THE CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION, INC.

The California Public-Safety Radio Association ("CPRA")
submits the following reply comments in response to the
Commission's Notice of Proposed Rule making in the above-
captioned proceeding, FCC No. 92-469, released November 6,
1992.

Respectfully submitted,

California Public-Safety Radio Association, Inc.
c/o City of Long Beach, Electronic Systems
1601 San Francisco Avenue
Long Beach, CA 90813

By:



Donald E. Root, Jr., Dockets Chairman

July 29, 1993

No. of Copies rec'd
List ABCDE



IMPLEMENTATION SCHEDULE/MIGRATION PATH

CPRA supports "Option A" of the LMCC migration plan, with the understanding that Public Safety will retain the additional channels created, so that an organized, coordinated implementation may take place with minimal impact on the existing systems.

CPRA finds the concept presented by the AAR to split the 150 MHz band into 15 kHz/7.5 kHz channels has merit and deserves further consideration, but is concerned how U.S. operations conducted under such a plan would be impacted by the operations of stations in Canada and Mexico. The current spacing (15 kHz in the U.S. against 25 kHz spacing in Mexico) causes frequent situations of harmful interference to safety-of-life communications. CPRA encourages the Commission to take this opportunity to address this severe problem.

CPRA is concerned that the Notice attempts to legislate technology in its current form, as compared to the regulation of technology.

SPECTRUM EFFICIENCY

CPRA appreciates the intent of Commission to increase the rate at which communications takes place, while decreasing the occupied bandwidth. CPRA is very concerned that this goal

does not appear to account for very high data rate communications, such as live-motion video or digitized images, requiring large amounts of bandwidth. CPRA recommends that this aspect be fully explored.

CPRA feels the periodic review of technology on the part of the Commission is a better approach than to mandate the

RESUBMISSION OF APPLICATIONS

CPRA opposes the proposed change from sixty days to thirty days for resubmission of applications returned for corrections. This does not allow time for follow up actions with the FAA, for example, or for further required frequency coordination activities. CPRA instead supports lengthening this period to ninety days for Public Safety applicants.

SEPARATE RULES FOR PUBLIC SAFETY

CPRA agrees with the Commission that the concept of economic stimulation is a good one; However, CPRA strongly recommends the Commission develop separate rules for the Public Safety services, with their different operating conditions, providing communications systems to cover an entire geo-political division as compared to the other services where a fixed radius method of operation is acceptable.